

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DEFENDANT ANNA BARENBOYM'S ASSENTED-TO MOTION TO TRAVEL

Defendant Anna Barenboym (“Ms. Barenboym”) moves this Court with the assent of the government and U.S. Pretrial Services (“Pretrial Services”) to modify the Court’s Order Setting Conditions of Release (dkt #17) to allow Ms. Barenboym to travel to Florida.

As grounds for this motion, Ms. Barenboym states that she, her husband, and their three children are hoping to visit Florida together over the children's April break. The family proposes to drive to and from Florida, leaving Massachusetts on or after April 14, 2022 and returning to Massachusetts on or before April 25, 2022. Ms. Barenboym will provide her itinerary and contact information to Pretrial Services in advance of the travel, and will contact Pretrial Services during the trip at whatever frequency that Office requires, including but not limited to before she leaves for Florida and again upon her return to Massachusetts.

For the foregoing reasons, Ms. Barenboym requests that the Court issue an order permitting Ms. Barenboym to travel to Florida from April 14, 2022 to April 25, 2022.

LOCAL RULE 7.1(a)(2) CERTIFICATION

Undersigned counsel has discussed this Motion with Pretrial Services and counsel for the government, both of whom assent to this Motion.

Respectfully submitted,

ANNA BARENBOYM,
By her attorney,

/s/ Sara E. Silva

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